REMARKS

Summary of the Office Action

Claims 1-20 stand rejected under U.S.C. ∋103(a) as being unpatentable over Reber (US, 6,138,151) in view of Bhattacharjya et al. (US, 6,456393).

Claims 1-6 and 8-17 stand objected to because of minor informalities.

Summary of Response to the Office Action

Applicant amends independent claims 1 and 10 in accordance with the Examiner's suggestion, amends independent claims 1, 7, 10, and 18 and dependent claims 2 and 11 to further define the invention, and amends dependent claim 17 to correct a minor informality. Accordingly, claims 1-20 are presently pending for consideration.

All Claims Define Allowable Subject Matter

Claims 1-20 stand rejected under U.S.C. ∋103(a) as being unpatentable over Reber (US, 6,138,151) in view of Bhattacharjya et al. (US, 6,456393). Applicant respectfully traverses the rejections on grounds that it fails to set forth a *prima facie* case of obviousness.

Independent claims 1 and 18 both recite an image processing apparatus including "the hyperdocument data includes appearance information defining location of embedding in the document image" and "an embedding part that uses the coupling information to determine at least a portion of the image element to embed the coupling information." Similarly, independent claim 7 recites an image forming medium including "coupling information from hyperdocument data determines at least a portion of the image element to embed the coupling information" and "appearance information from the hyperdocument data defines location of embedding in an image document." Furthermore, independent claim 10 recites an image forming method including "inputting the hyperdocument data, which includes appearance information defining

location of embedding in the document image" and "using the coupling information to determine at least a portion of the image element to embed the coupling information." Applicant respectfully submits that at least these features of amended independent claims 1, 7, 10, and 18 are neither taught nor suggested by Reber and Bhattacharjya et al., whether taken singly or combined.

The Office Action admits that "Reber does not disclose expressly that said coupling information is embedded over at least part of the image element." Thus, Office Action relies upon Bhattacharjya et al. for allegedly teaching embedding computer-readable information over at least part of an image element. As a result, the Office Action alleges that "it would have been obvious to a person of ordinary skill in the art to embed the coupling information taught by Reber using the method taught by Bhattacharjya et al. through which the digital data is encoded directly and unobtrusively on associated text data." The Office Action asserts that the computer-readable information taught by Bhattacharjya et al. would be the coupling information taught by Reber. In addition, the Office Action alleges that motivation for doing so "would have been to be able to embed said coupling data without affecting the document's appearance to a human reader." Applicant respectfully disagrees.

Reber teaches (col. 2, lines 1-55, and Abstract) a method of navigating an electronic network that includes steps of: reading a plurality of codes from an object; communicating a portion of one of the plurality of code to an appropriate data base; receiving translation information from the appropriate data base to associate a plurality of addresses with the plurality of codes; and translating the one of the plurality of codes to an appropriate electronic address using the translation information. In contrast, Applicant's claimed invention recites an image processing apparatus and an image processing method that are adapted to use coupling

information inputted by the input part (i.e., a portion of the printed code) to determine a size of area needed to embed the coupling information on the image element. However, Reber is completely silent about implementing a portion of code to specify the size of an embedding area.

In addition, Applicant respectfully asserts that Bhattacharjya et al. teaches embedding the message's successive bits in the entity (i.e., image element) at the dither-matrix cells randomly selected by the processor (col. 5, line 63 to col. 6, line 55, item number 118 of FIG. 11). In contrast, Applicant's claimed invention requires the appearance information to define the location of embedding (i.e., image element in which the coupling information is embedded) and uses the coupling information (i.e., message's successive bits, message bitstream) to determine the size of embedding area within the image element where the coupling information to be embedded. Applicant respectfully submits that Bhattacharjya et al. is completely silent about these features described above.

Thus, Applicant respectfully asserts, that Reber and Bhattacharjya et al., whether taken singly or combined, is completely silent with regard to at least the features of amended independent claims 1, 7, 10, and 18. Accordingly, Applicant respectfully asserts that Reber and Bhattacharjya et al., whether taken individually or in combination, neither teach nor suggest the novel combination of features clearly recited in amended independent claims 1, 7, 10, and 18, hence dependent claims 2-6, 8-9, 11-16, and 19-20.

CONCLUSION

In view of the foregoing remarks, Applicant respectfully requests reconsideration of this application, withdrawal of all rejections, and the timely allowance of all pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.R.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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